

KIRTON LAW FIRM

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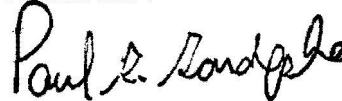
May 25, 2021

VIA ELECTRONIC FILING

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

Memo Endorsed: This application is granted. The briefing schedule provided below is approved. The Court will issue a separate order regarding the date for the hearing on the pre-trial motions.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Dated: May 28, 2021

Re: *United States v. Alexei Saab, 19 cr. 676 (PGG)*

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. Counsel writes to ask this Court to accept a late filing of pretrial motions.

This Court set a filing date of May 19, 2021, to file defense motions. I was unable to complete the filing on time because of an emergency medical situation. I filed the motions yesterday, May 24, 2021. I am the primary caretaker for a close relative who resides in New York City. She had surgery on May 14, 2021.¹ The discharge was supposed to be on or about May 17, 2021. She suffered some complications, and the window was moved to May 19, 2021. On May 19, 2021, there was a significant setback. I was on the phone with doctors, friends, and relatives for about 12 hours on May 19th. Her situation stabilized at about 11:00 pm. She remains hospitalized, but her medical condition is improving.

I reached out to the Government during the emergency. They were very generous and proposed the following schedule:²

1. Defense file on or before May 24, 2021.
2. Government opposition due on or before June 16, 2021.

¹ We made plans for the surgery over the last 18 months.

² The defense adopts the proposed schedule.

3. Defense reply due on or before June 23, 2021.
4. Return date to be set by the Court.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton

Marlon G. Kirton, Esq.

cc: Jessica Fender, Assistant United States Attorney (via electronic mail)
Jason Richman, Assistant United States Attorney (via electronic mail)
Esere Onadowan, Esq. (via electronic mail)